

BRAFF, HARRIS & SUKONECK

Keith Harris

Attorney I.D. No. 018121992

COUNSELLORS AT LAW

P.O. BOX 657

LIVINGSTON, NEW JERSEY 07039

Telephone: (973) 994-6677

Attorneys for Defendants, Devanta Watson and Al & AY Transportation Inc.

Our File No. 348.23328

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**DEOKSU LIM,**

**Plaintiff,**

**vs.**

**DEVANTA WATSON, AL & AY  
TRANSPORTATION INC., MIHWA  
GOOLSBY, JOHN DOES (fictitious  
name) and ABC CORP. (fictitious  
name),**

**Defendants.**

**DOCKET NO. 2:23-cv-4139**

**Civil Action**

**DEFENDANTS, DEVANTA WATSON AND  
AL & AY TRANSPORTATION INC.'S  
NOTICE OF REMOVAL**

**TO:** Sung H. Jang, Esq.  
SJ Law  
333 Sylvan Avenue, Suite 106  
Englewood Cliffs, NJ 07632  
Attorneys for Plaintiff, Deoksu Lim

**PLEASE TAKE NOTICE** that pursuant to 28 U.S.C. §§ 1332(a)(1), 1441(a)-(c), and 1446, Defendants, Devanta Watson and Al & AY Transportation Inc., by their attorney, hereby removes this action from the Superior Court of New Jersey, Bergen County, Law Division to the United States District Court for the District of New Jersey. In support of this Notice of Removal, defendants, state as follows:

1. The plaintiff is a resident of Flushing, New York.
2. Defendant, Devanta Watson is a resident of Fort Lauderdale, Florida.
3. Defendant, Al & AY Transportation Inc. is a business with its principal place of business located in Chicago Ridge, Illinois.
4. Defendant, Mihwa Goolsby is a resident of West Chester, Pennsylvania.

5. This matter involves an alleged incident claimed to have occurred on June 16, 2022.

6. The plaintiff filed a Complaint and an Amended Complaint in the Superior Court of New Jersey, Bergen County in Hackensack, New Jersey on May 16, 2023 alleging personal injuries as a result of the subject incident. See Ex. A attached hereto.

7. The plaintiff alleges a rotator cuff injury for which she had surgery and claims cervical and lumbar disc herniations. The plaintiff has had injections, an epidurogram and L4-L5 facet rhizotomy which if proven has a value which meets the jurisdictional limit of \$75,000.00.

8. The Court has subject matter jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a)(1).


9. The plaintiff's Complaint was filed on May 16, 2023 but has not been served on the defendants therefore the Notice of Removal is timely filed. See 28 U.S.C. §1446.

10. A copy of this notice is being served upon the Clerk of the Superior Court of New Jersey, Bergen County, Law Division.

11. Written notice of this Notice of Removal of this action is being caused to be served on the plaintiff.

WHEREFORE, Defendants, Devanta Watson and AI & AY Transportation Inc. gives notice that this action is removed from the Superior Court of New Jersey, Bergen County, Law Division, to the United States District Court for the District of New Jersey.

BRAFF, HARRIS & SUKONECK  
Attorneys for Defendants, Devanta Watson and AI & AY  
Transportation Inc.

By:   
\_\_\_\_\_  
KEITH HARRIS

Dated: August 2, 2023